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9 Counsel to E. Lynn Schoenmann
10 Trustee in bankruptcy

11 UNITED STATES BANKRUPTCY COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 SAN FRANCISCO DIVISION

14 In re

Case No. 21-30299
Chapter 7

15 ACEH CAPITAL, LLC
16 aka ACE Capital, LLC,

Debtor.

17 DECLARATION IN SUPPORT OF APPLICATION FOR ORDER
18 AUTHORIZING EMPLOYMENT OF ACCOUNTANT

19 I, Jay D. Crom, hereby declare:

20 1. I am a certified public accountant in the State of California, and am a partner in the
21 firm of Bachecki, Crom & Co., LLP, Certified Public Accountants.

22 2. I have held a license as certified public accountant for over thirty-nine (39) years. I
23 also hold a certificate from the Association of Insolvency and Restructuring Advisors as a
24 Certified Insolvency and Restructuring Advisor. I also hold a certificate as a Certified Fraud
25 Examiner.

26 3. The accounting firm has extensive experience in providing financial investigation, tax
27 preparation, bankruptcy accounting and financial advisory services.

28 4. To the best of my knowledge, information and belief, Bachecki, Crom & Co., LLP,

1 has no connection, except as set forth herein, with any of the parties or interested persons in the
2 within bankruptcy case. **The Accountant discloses the following information in the event that**
3 **it is considered a connection: The Accountant serves as the personal tax accountant for the**
4 **Trustee.**

5 5. Except for employment by the Trustee in unrelated cases and as disclosed herein,
6 neither the accounting firm, its members, nor its employees have connections with the debtor,
7 creditors, or any other party in interest, their respective attorneys and accountants, or the United
8 States Trustee or any other person employed by the office of the United States Trustee.

9 6. That the accounting firm is not presently employed by any creditor of the estate; does
10 not hold any interest adverse to the estate; and, the accounting firm, its officers and employees,
11 are disinterested persons as defined by 11 USC sect 101(14), all as required by 11 USC section
12 327 (a).

13 I have directed counsel for the Trustee to serve the Office of The U.S. Trustee by U.S.
14 Mail with the Application for Order Authorizing Employment of Accountant, this supporting
15 declaration, and a proposed Order Authorizing Employment of Accountant concurrent with their
16 electronic filing of the documents.

17 I declare under penalty and perjury that the foregoing is true and correct.

18 Executed in South San Francisco, California on April 22, 2021.

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22 JAY D. CROM
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